

**COLE, SCHOTZ, MEISEL,
FORMAN & LEONARD, P.A.**

A Professional Corporation

Court Plaza North

25 Main Street

P.O. Box 800

Hackensack, New Jersey 07602-0800

Michael D. Sirota, Esq.

David M. Bass, Esq.

Felice R. Yudkin, Esq.

(201) 489-3000

(201) 489-1536 Facsimile

Proposed Attorneys for Crumbs Bake Shop, Inc., *et al.*,

Debtors-in-Possession

In re:

CRUMBS BAKE SHOP, INC.,

Debtor-in-Possession.

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY
CASE NO. 14-

Chapter 11

In re:

CRUMBS HOLDINGS LLC,

Debtor-in-Possession.

**NOTICE OF MOTION FOR AN ORDER
DIRECTING THE JOINT ADMINISTRATION
OF THE DEBTORS'**

**CHAPTER 11 CASES PURSUANT TO
FED. R. BANKR. P. 1015(b) AND GRANTING
OTHER RELATED RELIEF**

In re:

CRUMBS 42ND STREET II, LLC,

Debtor-in-Possession.

HEARING DATE AND TIME:

July ____, 2014, at __: __.m.

In re:

CRUMBS BROAD STREET, LLC,

Debtor-in-Possession.

ORAL ARGUMENT REQUESTED

In re:

CRUMBS BROADWAY LLC,

Debtor-in-Possession.

In re:

CRUMBS FEDERAL STREET, LLC,
Debtor-in-Possession.

In re:

CRUMBS GARMENT CENTER LLC,
Debtor-in-Possession.

In re:

CRUMBS GRAND CENTRAL LLC,
Debtor-in-Possession.

In re:

CRUMBS GREENVALE LLC,
Debtor-in-Possession.

In re:

CRUMBS GREENWICH, LLC,
Debtor-in-Possession.

In re:

CRUMBS HOBOKEN, LLC,
Debtor-in-Possession.

In re:

CRUMBS II, LLC,
Debtor-in-Possession.

In re:

CRUMBS LARCHMONT, LLC,
Debtor-in-Possession.

In re:

CRUMBS LEXINGTON LLC,

Debtor-in-Possession.

In re:

CRUMBS PARK AVENUE LLC,

Debtor-in-Possession.

In re:

CRUMBS RETAIL BAKE SHOPS,
LLC (F/K/A CRUMBS FULTON
STREET, LLC),

Debtor-in-Possession.

In re:

CRUMBS STAMFORD, LLC,

Debtor-in-Possession.

In re:

CRUMBS THIRD AVENUE LLC,

Debtor-in-Possession.

In re:

CRUMBS TIMES SQUARE LLC,

Debtor-in-Possession.

In re:

CRUMBS UNION SQUARE LLC,

Debtor-in-Possession.

In re:

CRUMBS UNION STATION LLC,
Debtor-in-Possession.

In re:

CRUMBS WEST MADISON, LLC,
Debtor-in-Possession.

In re:

CRUMBS WOODBURY LLC,
Debtor-in-Possession.

TO: All Parties-in-Interest

PLEASE TAKE NOTICE that pursuant to an Order Regarding Application For Expedited Consideration of First Day Matters served herewith, on the ____ day of July, 2014, at ____ .m., or as soon thereafter as counsel may be heard, the undersigned, proposed counsel for Crumbs Bake Shop, Inc., Crumbs Holdings LLC, Crumbs 42nd Street II, LLC, Crumbs Broad Street, LLC, Crumbs Broadway LLC, Crumbs Federal Street, LLC, Crumbs Garment Center LLC, Crumbs Grand Central LLC, Crumbs Greenvale LLC, Crumbs Greenwich, LLC, Crumbs Hoboken, LLC, Crumbs II, LLC, Crumbs Larchmont, LLC, Crumbs Lexington LLC, Crumbs Park Avenue LLC, Crumbs Retail Bake Shops, LLC (f/k/a Crumbs Fulton Street, LLC), Crumbs Stamford, LLC, Crumbs Third Avenue LLC, Crumbs Times Square LLC, Crumbs Union Square LLC, Crumbs Union Station LLC, Crumbs West Madison, LLC and Crumbs Woodbury LLC, the within debtors and debtors-in-possession (the “**Debtors**”), shall move before the assigned United States Bankruptcy Judge, at the United States Bankruptcy Court, Martin Luther King Jr. Federal Building, 50 Walnut Street, Newark, New Jersey 07102, for entry

of an Order directing the joint administration of the Debtors' Chapter 11 cases pursuant to Fed. R. Bankr. P. 1015(b) (the "**Motion**").

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the "First Day" Affidavit of John D. Ireland and the accompanying Application, which collectively set forth the relevant factual and legal bases upon which the relief requested should be granted. A proposed Order granting the relief requested in the Motion also is submitted herewith.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall be presented in accordance with the Order Regarding Application for Expedited Consideration of First Day Matters.

PLEASE TAKE FURTHER NOTICE that unless objections are timely presented, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a) and the relief requested may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that the undersigned requests oral argument on the return date of the Motion.

COLE, SCHOTZ, MEISEL,
FORMAN & LEONARD, P.A.
Proposed Attorneys for Crumbs Bake Shop, Inc., *et al.*,
Debtors-in-Possession

By: /s/ David M. Bass
Michael D. Sirota, Esq.
David M. Bass, Esq.
Felice R. Yudkin, Esq.

DATED: July 11, 2014